

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	<b>Jointly Administered Under</b>
<b>DEEP MARINE HOLDINGS, INC. et al.,</b>	§	<b>Case No. 09-39313-H1-11</b>
<b>Debtors.</b>	§	

**McKool Smith P.C.'S WITNESS AND EXHIBIT LIST**  
(Relates to Docket #373 and #651)

***WITNESSES***

McKool Smith P.C., former counsel to the Official Committee of Unsecured Creditors in the above referenced, jointly administered Chapter 11 cases (“McKool Smith”), may call any of the following witnesses at the hearing on *McKool Smith’s First Interim Application* [docket #373] and *Second and Final Application* [docket #651] to be held October 12, 2010, at 9:00 a.m. whether in person or by proffer:

1. Paul Moak, attorney with McKool Smith;
2. Mark Mathie, attorney with McKool Smith;
3. Any witness identified or called by another party or by the Court;
4. Any witnesses necessary to rebut the testimony of witnesses called or designated by any other party.

***EXHIBITS***

EXHIBIT	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE	DISPOSITION
1.	First Interim Application of McKool Smith P.C., with exhibits [docket #373]					
2.	Second and Final Application of McKool Smith P.C., with exhibits [docket #651]					

<b>EXHIBIT</b>	<b>DESCRIPTION</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>	<b>DATE</b>	<b>DISPOSITION</b>
3.	Detailed time descriptions of Mark Mathie's time					
4.	Biographies of relevant firm personnel					
5.	Complaint in Adv. No. 10-3312 [docket #1]					
6.	Order authorizing Committee to pursue Eni Receivable [docket # 181] (Case No. 09-39313)					
7.	Complaint in Adv. No. 10-3116 [docket #1]					
8.	Response to Sanctions Motion, with exhibits [docket #38], Adv. No. 10-3312					
9.	Order Confirming Plan of Reorganization (with attachments) [docket #504]					
10.	Transcript of Confirmation Hearing held June 2, 2010					
11.	Transcript of first-day hearings held December 17 and 18, 2009					
12.	Docket of Main Case 09-39313					
13.	Notice of Deposition of The Triomphe Investors, Inc. (Adv. No. 10-3026)					
14.	Internal accounting showing internal write-offs prior to submission of bills					

McKool Smith reserves the right to use any exhibits designated and/or used by any other party. McKool Smith reserves the right to use any exhibits needed for impeachment purposes.

McKool Smith reserves the right to supplement or amend this Witness and Exhibit List at any time prior to the trial.

DATED: October 7, 2010.

Respectfully submitted,

MCKOOL SMITH P.C.

By: /s/ Hugh M. Ray, III  
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ATTORNEYS FORMERLY FOR OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS

**CERTIFICATE OF SERVICE**

I hereby certify that on October 7, 2010, a true and correct copy of the foregoing document has been served via DLR 5.1 and the ECF system to the parties on the ECF service list.

/s/ Hugh M. Ray, III  
HUGH M. RAY, III